REMARKS

Applicants have carefully reviewed and considered the Office Action mailed on
November 8, 2010 (hereafter "Office Action") and the references cited therein. Applicants have
not added amended, canceled nor added any claims. Applicants previously canceled claim 5.
Accordingly, claims 1-4 and 6-19 remain pending in the application, of which claims 1, 8 and 14
are independent.

RESPONSE UNDER 37 C.F.R. § 1.111
Serial Number: 10/780,853
Filing Date: February 19, 2004
Title: Method and Apparatus for Multi-Chip ARL Synchronization

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Dkt: 0063-106001/BU3034

Claim Rejections – 35 U.S.C. § 103

In the Office Action, claims 1, 4, 7, 8, 11, 12, 14, 17 and 18 were rejected under 35

U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Publication to 2003/0169734 to

Lu et al. (hereafter "Lu") in view of U.S. Patent 6,751,189 to Gullicksen et al. (hereafter

"Gullicksen") and U.S. Patent Publication 2002/0018481 to Mor et al. (hereafter "Mor"); claims

2, 9 and 15 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lu,

Gullicksen and Mor in view of U.S. Patent 6,111,874 to Kerstein; claims 3, 10 and 16 were

rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lu, Gullicksen and Mor

in view of U.S. Patent Publication 2002/0037006 to Sampath et al. (hereafter "Sampath"); and

claims 6, 13 and 19 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over

Lu, Gullicksen and Mor in view of U.S. Patent 6,094,434 to Kotzur et al. (hereafter "Kotzur").

Applicants respectfully address these rejections.

In order to establish a *prima facie* showing of obviousness (unpatentability) based on

multiple references it must be demonstrated that the prior art, when properly combined, discloses

every element of the rejected claims. Applicants respectfully submit that Lu in view of

Gullicksen and Mor does not render independent claims 1, 8 and 14 obvious, because those

documents, alone or in combination, fail to disclose every element of the independent claims, as

discussed below. Further, by virtue of claim dependency, dependent claims 2-4 and 6, which

depend from claim 1, dependent claims 9-11 and 13, which depend from claim 8, and dependent

claims 15-17 and 19, which depend from claim 14, are also not obvious over Lu, Gullicksen and

Mor, alone or in combination with Kerstein, Sampath and/or Kotzur, because Kerstein, Sampath

and Kotzur do not compensate for the deficiencies of Lu, Gullicksen and Mor and are not cited

as such.

Claim 1 recites:

A method of handling datagrams in a network device coupled to other
network devices, the method comprising:
receiving an incoming datagram at a port of the network device;
determining an egress port for the incoming datagram based on a
destination address contained in the incoming datagram and a lookup of an
address resolution lookup (ARL) table;
performing a lookup of the ARL table based on a source address contained
in the incoming datagram to determine whether the source address has been
learned previously;

       writing an entry into the ARL table when the source address has not been learned previously;

       determining whether the other network devices have learned the source address when the source address has been learned previously; and

       when it is determined that the other network devices have not learned the source address:

         sending, by the network device, a learning message with the source address to the other network devices; and

         re-sending, by the network device, the learning message to the other network devices until the learning message is returned to the network device from one of the other network devices. (*Emphasis supplied*)

Claim 1 is directed to a method of handling datagrams in a network device coupled to other network devices. The method of claim 1 includes receiving an incoming datagram at a port of the network device. The method of claim 1 also includes determining whether the other network devices have learned a source address of the datagram when the source address has been learned previously by the network device. In the method of claim 1, when it is determined that the other network devices have not learned the source address, the method includes (1) *sending, by the network device, a learning message with the source address to the other network devices*; and (2) *re-sending, by the network device, the learning message to the other network devices until the learning message is returned to the network device from one of the other network devices*.

Without addressing the remarks made in the Office Action regarding claim 1 with respect to Lu, which are not conceded, Applicants note that the Office Action concedes that Lu fails to disclose re-sending, by the network device, the learning message to the other network devices until the learning message is returned to the network device from one of the other network devices, and instead cites both Gullicksen (column 8, lines 15-20; col. 9, lines 4-15) and Mor (paragraph 0069) as disclosing this aspect of claim 1. Applicants respectfully disagree with these assertions.

Gullicksen discloses the use of a Connection State Distribution Protocol (CSDP) for distributing connection and topology information between nodes of one or more network rings. Column 8, lines 15-20 and column 9, lines 4-15 disclose the use of CSDP messages for sharing connection and topology information, not the use of learning messages, as recited in claim 1). The CSDP messages of Gullicksen are sent in response to a configuration change or initialization

of a network ring (*See* Gullicksen, col. 8, lines 15-16) not as a result of a determination that other network devices have not learned a source address, as recited in claim 1.

Mor discloses the use of lock packets for reserving data communication bandwidth in a network ring (*See* Mor, paragraph [0068]), not the use of learning messages, as recited in claim 1. The lock packet of Mor is used to inform the nodes of a network ring that a bandwidth reservation is about to be made. The lock packet is not sent as a result of a determination that other network devices have not learned a source address, as recited in claim 1.

Based on the foregoing, the rejection of claim 1 over Lu, Gullicksen and Mor is improper, because even if one of skill in the art were to make the proposed combination, which is it is not conceded that he or she would, that combination fails to disclose each and every element of claim 1. Further, independent claims 8 and 14 included similar limitations as those discussed above with respect to claim 1. Accordingly, claims 8 and 14 are also not rendered obvious by Lu, alone or in combination with Gullicksen and Mor on at least the same basis as claim 1. Accordingly, Applicants respectfully request that the rejection of claims 1, 8 and 14 be withdrawn.

By virtue of claim dependency, claims 4 and 7, which depend from claim 1; claims 11 and 12, which depend from claim 8; and claims 17 and 18, which depend from claim 14, are also not rendered obvious by Lu, alone or in combination with Gullicksen and Mor, on at least the same basis as claim 1. Therefore, Applicants respectfully request that the rejection of claims 4, 7, 11, 12, 17 and 18 be withdrawn.

Also by virtue of claim dependency, claims 2, 3 and 6, which depend from claim 1; claims 9, 10 and 13, which depend from claim 8; and claims 15, 16 and 19, which depend from claim 14, are not rendered obvious by Lu, Gullicksen and Mor, alone or in combination with Kerstein, Sampath and/or Kotzur, because Kerstein, Sampath and Kotzur do not compensate for the deficiencies of Lu and Szczepanek discussed above, and are not cited as such. Accordingly, Applicants respectfully request that the rejections of claims 2, 3, 6, 9, 10, 13, 15, 16 and 19 be withdrawn.

Conclusion

Applicants believe that all pending claims are in condition for allowance and respectfully request notification of such allowance. The Examiner may telephone Applicants' attorney (360-930-3533) to facilitate prosecution of this application.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as intended to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-3521.

Respectfully submitted,

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